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**QUINTAIROS, PRIETO, WOOD & BOYER, P.A.**

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

-----X  
ASHLEY RANDHAWA,

Docket No.:

Plaintiff(s),

***NOTICE OF REMOVAL***

-against-

SOPHIA OTERO and MICHAEL OTERO,

Defendant(s).

-----X  
**TO: TO THE CLERK OF THE U.S. DISTRICT COURT:**

**PLEASE TAKE NOTICE** that, pursuant to 28 U.S.C. §§ 1331, 1367(a), 1441, 1446 defendants, SOPHIA OTERO and MICHAEL OTERO, through the undersigned attorneys, hereby remove the above-captioned civil action, and all claims and causes of action therein, from the Supreme Court of New York, Westchester County, to the United States District Court for the Southern District of New York.

**JURISDICTION & AUTHORITY FOR REMOVAL**

1. An action was commenced by Summons and Complaint dated November 8, 2022, against the Defendants in the Supreme Court of the State of New York, County of Westchester, entitled *ASHLEY RANDHAWA v. SOPHIA OTERO AND MICHAEL OTERO*, under Index Number 67939/2022. A copy of the Summons and Complaint is annexed hereto as Exhibit “A”.

2. This Summons and Complaint was served upon defendants, SOPHIA OTERO and MICHAEL OTERO, on November 10, 2022, by service upon the NYS Secretary of State pursuant to NYS Vehicle and Traffic Law § 253 and by certified mail on November 14, 2022 to 476 Shelton Road, Trumbull, Connecticut 06611. Attached hereto as Exhibit “B” are copies Affidavits of Service filed with Westchester County Supreme Court’s Clerk’s office.

3. The Southern District of New York encompasses Westchester County, New York.

4. Attached hereto as Exhibit “C” is a copy of the Defendants’ Answer with Jury Demand and affirmative defenses.

5. The above-described action is one in which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332 and is one that may be removed to this Court by Defendants herein, pursuant to the provision of 28 U.S.C. § 1441, in that it is a civil action, with, upon information and belief, more than \$75,000 in controversy.

6. The plaintiff resides in the State of New York, 5 Elm Street, New Rochelle, County of Westchester. See Exhibit A, para. 1 and page 6.

7. Defendant, SOPHIA OTERO, an individual, resides at 476 Shelton Road, Trumbull, Connecticut 06611. See Exhibit A, para. 2 and page 7.

8. Defendant, MICHAEL OTERO, an individual, resides at 476 Shelton Road, Trumbull, Connecticut 06611. Exhibit A, para. 2. and page 7.

9. The Plaintiff’s Verified Complaint sets forth general allegations that Plaintiff ASHLEY RANDHAWA sustained “serious personal injuries as defined by Section 5102 of the Law of the State of New York.” Thus, upon information and belief, Plaintiff’s amount in controversy exceeds the \$75,000.00 threshold. Therefore, the District Court has jurisdiction over this action.

10. WHEREFORE, SOPHIA OTERO and MICHAEL OTERO pray that the action now pending against it in the Supreme Court of the State of New York, County of Westchester, be removed therefrom to the United States District Court for the Southern District of New York, and for such other and further relief this Court deems just and proper.

**NOTICE TO PLAINTIFF AND SUPREME COURT OF NEW YORK, WESTCHESTER**

**COUNTY OF REMOVAL**

Defendants, SOPHIA OTERO and MICHAEL OTERO, through their attorneys, will promptly serve a copy of this Notice of Removal on counsel for the Plaintiff, and will promptly file a copy of this Notice of Removal with the Clerk of the Supreme Court, County of Westchester pursuant to 28 U.S.C. § 1446(d).

Dated: New York, New York  
December 12, 2022

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

*s/ Jyoti M. Halsband*

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Lisa D'Angelo  
Clerk of the Court  
Supreme Court of the State of New York  
Westchester County

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